

engineered and created from available facilities and equipment assigned by CNAS.

CNAS equipment and facility databases contain no special information on the identity of the customer. The circuit design is based entirely on the service ordered and its tariffed parameters. The mechanized assignment processes employed are blind to the use that the customer will make of the service. They assign equipment, facilities and telephone numbers on a "first-come, first-served" basis. The CNAS circuit design process is automated and is based on efficiency of routing and availability of facilities appropriate for the service ordered by the customer. CNAS identifies and assigns specific pieces of equipment in each office rather than generic equipment types. CNAS contains no information on the quality of a particular facility or item of central office equipment; the processes of assignment and mechanized circuit design therefore present no opportunity for discrimination on that basis.

Once the ordered service has been designed, a document known as the Circuit Layout Record ("CLR") is automatically transmitted to the necessary work organization(s).

Service orders for both designed and nondesigned service are transmitted to a Facility Assignment Center ("FAC") or similar organization. These operations are supported by the Mechanized Assignment Record Keeping ("MARK") system, which inventories and assigns central office line equipment and telephone numbers. In instances where discrepancies in normal assignment functions

occur, for example, where facilities or line equipment are unavailable, the order will be forwarded to a facility assigner who seeks alternate telephone company facilities. Because GTE's switched services are provided using common public network facilities selected automatically for each individual call, there is no opportunity for GTE to assign specific facilities or discriminate on the basis of quality. Any attempt to discriminate in the engineering of a circuit would require extraordinary manual effort -- among numerous individual employees in diverse locations -- and would result in costly disruption of the provisioning processes due to the bypassing of existing mechanized systems and procedures for circuit design and provisioning.

A control center coordinates the activities of the various organizations to assure that the physical work necessary to provide overall service is accomplished. Work priorities are established by the due dates provided on the service order. The design of GTE's administrative support systems prevent individual employees from altering service orders, due dates or circuit related technical specifications.

When physical work is required at the customer's premises, a field technician is automatically dispatched using the Automated Work Administration System ("AWAS") to install the service to a network interface. After performing the necessary work, the technician tests the service for operational functionality and to ensure that tariffed technical specifications are met. Testing

parameters are based only on the type of service ordered and are not associated with a customer's business affiliation. Because the sole purpose of the testing is to determine whether or not the installation meets tariffed standards, it is not necessary to record results more detailed than an indication of passage or failure.

When the service is established, the service order distribution system is updated to indicate completion. That system in turn notifies the billing system so that billing functions may be initiated.

GTE managers in installation work groups are measured based on the quality of service their units provide. The measurements track such items as the percent of installation due dates met for all types of services provided. Managers have an economic incentive to provide the best customer service in all cases.

All customers report service trouble to the Customer CARE center. The Customer CARE service attendant asks the identity of the service in trouble, the trouble location, and the nature of the trouble. If the Customer CARE service attendant cannot clear the trouble utilizing mechanized systems while speaking with the customer, GTE will obtain the customer's name, however, restoration intervals depend strictly on the circuit type and the outage condition. In the case of nondesigned services, the customer is given a standard commitment interval depending upon the type of trouble reported and the facilities and equipment involved. These intervals are based on whether the customer is

completely out-of-service, or whether the trouble only partially affects service. Customers with complete service outages are given priority treatment. The design of these mechanized systems, which are separate and distinct from the service order systems, prevents GTE employees from changing service intervals. In addition, there is no indication on the trouble ticket record that distinguishes affiliated ESPs from nonaffiliated ESPs, or from any other customer.

Trouble reports for nondesigned services are entered into a mechanized trouble report tracking system, such as the Trouble Administration System ("TAS"). In conjunction with TAS, 4TEL Local Loop Test ("4TEL") or similar test systems, where installed, provide sophisticated testing capabilities for more accurate isolation of trouble. The tests performed and results obtained are used to restore the affected service to tariffed technical parameters. In the majority of cases, trouble reports for designed services are entered into a similar mechanized trouble tracking system.

Both manual and mechanized trouble tickets for designed and nondesigned services carry the date and time that a customer reported a service problem and the date and time that the problem was resolved. The trouble ticket serves as the audit trail for documentation of maintenance services quality and performance.

Trouble tickets involving designed services are passed on to the Special Service Control Center ("SSCC") this is assigned maintenance responsibility for the service. Upon receipt of the

trouble ticket, the SSCC performs tests to determine the cause of the reported trouble. Priority is given to trouble reports based on Commission-determined restoration requirements (e.g., military installations) and known critical services such as hospitals and police and fire departments. Trouble tickets that do not fall into these categories are handled on a "first-in, first-out" basis.

After the cause of trouble is identified, the matter is referred to the work organization responsible for repairing the affected network element. These work groups restore service based on the same priorities described above. When the problem has been resolved, testing is conducted to ensure that service has been restored to tariffed technical parameters, and the customer is notified.

Once the service is restored, the trouble disposition and clearance time is noted on the trouble ticket. This information is currently used to generate maintenance reports which show average out-of-service duration for trouble reports. This index is and will continue to be carefully monitored by GTE as a key service indicator.

GTE managers in maintenance work groups are measured based on the quality of service their units provide. The measurements track such items as average out-of-service duration. Managers have an economic incentive to provide the best customer service in all cases.

As demonstrated above, there is no opportunity for GTE

employees to discriminate on the basis of quality in providing service to customers. The provisioning process is highly mechanized and automated, with little room for individual discretion or intervention. The systems used in the circuit design, facility and equipment assignment, installation coordination, and maintenance trouble tracking processes contain no information as to a customer's business affiliation or the quality of particular facilities or equipment used to construct individual circuits.

GTE network installation and maintenance personnel will receive training on the Commission's requirements relating to the nondiscriminatory provision of services relating to ONA. GTE currently -- and will continue to -- advises employees involved in the provisioning of network services or the assignment of circuits that discrimination based upon the origin of a service request, or a customer's business affiliation, is forbidden. Violation of the rule will cause employees to be subjected to disciplinary action.

GTE will comply with the nondiscrimination reporting requirements applicable to the BOCs. GTE will file an annual affidavit stating that it does not discriminate in providing ONA services to competitive ESPs and their customers, including the installation, maintenance, and quality of such services. GTE will file quarterly installation and maintenance reports using the reporting categories and format adopted for BOC reports as described in BOC ONA Reconsideration Order at Appendix B.

## **6. End User Access**

This CEI parameter requires that, as to end users who access or activate a GTE enhanced service in a particular manner (e.g., abbreviated dialing, signaling or derived channels), GTE provide the same capabilities to end-users of all enhanced services that utilize GTE's facilities.

Inasmuch as GTE's enhanced services use the same tariffed services that would be used by any other user, all service features and options available under tariff to GTE's enhanced services are also available to all other users on the same terms and conditions. Consequently, end user access is identical for both GTE's enhanced services customers and the customers of competing ESPs.

## **7. Availability of CEI**

The Commission requires that CEI must "be fully operational and available on the date that [a carrier] offers its corresponding enhanced services to the public." (Phase I Order at para. 163). Additionally, the carrier must "specify a reasonable time prior to this date during which prospective users of CEI, such as enhanced services competitors, can utilize the CEI facilities and services for purposes of testing their enhanced service offerings."

CEI has been and will be operational and available on the same date that GTE offers its enhanced service. Additionally, the requirement for a reasonable testing period is met because

the underlying BSAs are all available today. No GTE enhanced service will be offered utilizing BSAs for ninety days after they are available, to afford competitor ESPs ample time to test their enhanced service utilizing them.

#### **8. Minimization of Transport Costs**

One particular area of CEI costing, transport cost minimization, merits special consideration as it has been the topic of much discussion in the industry during the ONA development process. The most requested minimization of transport technique is physical collocation. While collocation is one means of providing equality for GTE affiliated and nonaffiliated ESPs, it presents many operational and administrative problems. Operational problems include security, maintenance, building access, personnel training, and, potentially, labor relations. More troublesome, however, are the administrative ramifications of limited space availability. In those locations where sufficient space is available to meet initial ESP demand, innumerable problems would occur should demand eventually exceed supply, or should GTE later require space occupied by the ESPs. The Commission correctly recognized the many potential problems which could result from collocation and therefore did not mandate this alternative (Phase I Order at para. 152 and Dec. 22 Order at para. 181).

The ESPs have requested "virtual collocation" as an alternative to physical collocation. One alternative, the



virtual central office concept, entails GTE obtaining floor space outside the central office, providing high capacity transport from the central office to that facility and leasing space to ESPs. This alternative, like physical collocation, would essentially place GTE in the real estate leasing business and would give rise to many of the same serious operational and administrative problems associated with physical collocation. Another form of virtual collocation is banded pricing, where equal prices would be charged to all ESPs located within a specified distance of the central office. This would insure that the rates paid by nonaffiliated ESPs located within the mileage limit would be equal to those paid by collocated affiliated ESPs.

GTE's networks are currently and will continue in the future to be designed to fully utilize all types of technological efficiencies to reduce the cost of providing service (Phase I Reconsideration Order at note 261). Such arrangements will achieve the Commission's goal of minimizing the cost to ESPs if the resulting efficiencies are reflected in GTE's tariff prices. The savings obtained by efforts to minimize transport costs through technological means are currently averaged over the entire body of ratepayers, making available the most economic service possible to the full range of end users.

Certain ESPs have voiced two separate objectives with regard to minimization of transport: price equality with GTE affiliated ESPs, and the lowest possible transport rates. GTE's position on minimization of transport costs addresses both of these

objectives. Regardless of whether a GTE-affiliated enhanced service operation is physically collocated, absolute price equality will be maintained. GTE will require the affiliated ESP to forego any possible "short wire" efficiency and pay the standard tariffed rates available to other ESPs. Due to this parity neither physical collocation nor virtual collocation is required for price parity. Thus, GTE does not plan to provide such collocation for non-affiliated ESPs. The Commission has approved the use of such pricing parity as a method of complying with its minimization of transport costs CEI parameter (Dec. 22 Order at para. 166).

GTE will continue to serve its customers at the lowest possible cost. The current networks take advantage of multiplexing, hubbing, high capacity fiber optics, and other similar techniques to minimize the cost of providing service. Cost savings will, for the near term, generally continue to be passed on in broadly averaged loop rates. Where a specific customer has sufficient demand, however, networking efficiencies are available. For example, GTE offers various configurations of high capacity or DS-1 service at advantageous prices compared to individual voice grade lines. If a customer requires even greater capacity, DS-3 service is available at even more favorable prices per voice grade channel equivalent. Additional price reductions are also generally available on additional high capacity facilities terminating at a given location.

Since GTE currently offers advantageous rates where a

customer's capacity warrants, the remaining question is whether there is any justification for providing specialized transport rates for a single customer class: ESPS. GTE submits that this is not a viable option. Attempting to restrict certain tariff options or prices to a class of customers such as ESPs is neither desirable nor administratively feasible. All tariff options should be available to all customers. GTE will continue to offer services to all similarly situated customers under equal terms and conditions.

**9. Recipients of CEI**

GTE will not restrict the availability of the BSEs listed in Section III.b.2 of its ONA Plan to any particular class of customer. These BSEs, and their corresponding BSAs, will be made available to any customer for any use subject to applicable tariff terms and conditions.

**B. COMPLIANCE WITH NONDISCRIMINATION SAFEGUARDS**

**1. Customer Proprietary Network Information (CPNI)**

**a. Individual CPNI**

GTE will continue its existing practice of making a customer's CPNI available to any non-GTE vendor requesting it, provided that the customer has authorized such a disclosure in writing. Current procedures have operated smoothly in the past and GTE expects similar smooth operation in the ONA context.

Upon approval of this ONA Plan, the following procedures will be put into effect. GTE will treat as CPNI the type of information typically associated with a customer's billing and payment history. GTE does not propose to treat the type of information typically found in a telephone directory (i.e., the "white pages") as CPNI. GTE will prepare and disseminate notices to multi-line business customers regarding their right to authorize the release of or restrict access to their CPNI from any ESP they choose. A sample notice is attached hereto as Appendix 1. This notice includes a response form that a customer can use to inform GTE of its preferred CPNI treatment. GTE will honor the customer's choice to restrict release of its CPNI until that customer expressly chooses otherwise. The form will also provide for the customer's release of some or all of its CPNI for specific time periods or for specific purposes. Should a customer submit a request for restricted treatment of its CPNI before GTE sends out the notices discussed above, GTE will honor the information contained in such a request.

Appropriate employees have been and will again be trained regarding GTE's obligations with respect to CPNI. At a minimum, all marketing employees and those with immediate access to customer records will be covered. The training will clarify that those employees involved in the marketing of enhanced services are prohibited from obtaining access by any means to CPNI where a customer has chosen to restrict such information. In addition, it will clarify that it is improper for any employee to assist another employee in obtaining improper access to CPNI by any means, including disclosure of user identification numbers which grant unrestricted access to CPNI data bases or otherwise providing an unauthorized access to such data bases. The training will specify that any employee who violates the CPNI protection procedures is subject to warning, suspension or dismissal, as appropriate.

The GTE ONA Order established four basic requirements governing GTE use of CPNI. These requirements are: (1) GTE must limit the access of its enhanced service personnel to a customer's CPNI if that customer so requests; (2) upon customer request, GTE must release a customer's CPNI to any ESP designated by the customer, and GTE must make this information available on the same terms and conditions that it makes CPNI available to its own enhanced services operations; (3) GTE must notify multiline business customers annually of these CPNI options; and (4) if GTE makes non-proprietary, aggregate CPNI availability to its own enhanced service personnel, it must make such information

available on the same terms and conditions to unaffiliated ESPs.

The GTE ONA Order further requires GTE to: (1) enclose, with its CPNI notices, response forms that customers could use to make their CPNI elections; (2) accommodate requests for partial or temporary restrictions; (3) honor any customer's CPNI instructions received prior to the mailing of CPNI notification; and (4) honor a customer's election to restrict CPNI until the customer specifically revokes this choice. GTE's compliance with these requirements is discussed below.

The GTE ONA Order applies the CPNI rules, with minor exceptions, to all information about customers' network services and customers' use of those services that GTE possesses by virtue of its provision of network services. The following list reflects items that GTE will treat as CPNI: (1) Type and quantity of regulated services purchased; (2) Repair information; (3) Traffic studies; (4) Usage data; (5) Customer calling patterns; and (6) Station message detail recording (SMDR) information.

GTE will release a customer's CPNI to any unaffiliated ESP that the customer authorized, in writing, to receive the information. This information will be made available to the unaffiliated vendors on the same terms and conditions that it is made to GTE-affiliated ESPs.

When a customer chooses to restrict GTE-affiliated ESP access to its CPNI, upon the receipt of a written request to that effect GTE will mark the customer's records in its support system data base. GTE will implement a password/ID system by April 4,

1996 per the GTE ONA Order that will limit access to such marked records to GTE personnel with proper authorization. GTE or affiliated personnel involved in the marketing of enhanced services will not be granted such authorization. Thus, the marked records will be available only to GTE service representatives, possessing the appropriate password/ID clearance, for use in handling the basic service needs of such customers.

All employees having access to customer records will be re-trained to ensure that proper procedures are followed. GTE has implemented similar training procedures relative to its voice messaging and protocol conversion services. The previous training package will be revised to include all requirements of GTE's ONA Order (including an acknowledgement form explaining the severity of penalties for noncompliance). The training will clarify that those employees involved in the marketing of enhanced services are prohibited from obtaining access by any means to CPNI where a customer has chosen to restrict such information. It will also establish that it is improper for any employee to assist another employee in obtaining improper access to CPNI by any means, including disclosure of user identification numbers or otherwise providing unauthorized access to such data bases. The training will specify that any employee who violates the CPNI restriction procedures is subject to warning, suspension or dismissal.

GTE will honor requests for restrictions in the release of

their CPNI until the customer expressly chooses to rescind the restrictions. GTE will also honor customer requests for partial or temporary CPNI restrictions from selected accounts of multiple account customers. Furthermore, GTE will maintain records of and will honor restriction requests received prior to distribution of the CPNI notices discussed infra.

GTE will attribute CPNI associated with a particular basic service to the entity that is billed for the service or in whose records the information appears. In the case of customer records with call-forwarding/forward-to numbers associated with particular ESPs, GTE cannot now restrict access to or blank that particular field in their support systems. Therefore, any CPNI that might be released to a GTE-affiliated ESP would be released in a format -- such as paper or magnetic tape -- which allows the forwarded-to number to be deleted. Upon request, GTE will provide to ESPs, free of charge, bulk quantities of its CPNI notices. ESPs can provide these forms to their customers, assisting customers who desire to implement restricted access to their CPNI.

**b. Aggregate CPNI**

GTE will make available to all unaffiliated enhanced service providers, on the same terms and conditions, any aggregate nonproprietary CPNI that is provided to any affiliated enhanced service provider. GTE will advise the industry about information that is available by appropriate means, such as company



newsletters, seminars, individual personal contacts and letters. This notification will describe the available information, the terms and dates on which it can be obtained, and how parties may obtain it.

GTE proposes to make available to all ESPs basic network information. The report derived from this information will be organized by ONA deployment area and office location. The report will be updated twice each year. Notification of the availability of the report will appear in company newsletters. The reports can be acquired by writing to: GTE Information Industry Team, 600 Hidden Ridge Drive, HQE02G18, P.O. Box 152092, Irving, Texas 75015-2092. Copies of the requests will be tracked and logged.

GTE does not plan to release additional non-proprietary, aggregate CPNI to its affiliated enhanced services providers. However, if that policy should be revised, GTE will notify enhanced service providers of available aggregated CPNI through company newsletters. Copies will be available through the GTE Information Industry Team.

### **c. Password ID System Requirements**

The BOC ONA Order concluded that password ID is the preferred method for restricting CPNI access for enhanced services personnel and should be implemented by the BOCs, absent a specific showing that it would be unduly burdensome for them to do so. In the BOC ONA Amendment Order, the Commission found that

the password/ID system described in the NYNEX ONA Plan was adequate for the databases to which they applied. The Commission does not require that the BOCs implement password/ID systems for auxiliary databases that contain fragmented CPNI and are not routinely accessed by enhanced services marketing personnel.

GTE will implement password protection to assure that GTE's primary databases do not permit disclosure of customer restricted CPNI to GTE personnel engaged in the sale of enhanced services. GTE will implement password protection for the Service Order Records Computer Entry System ("SORCES"), Service Order Load And Retrieval ("SOLAR"), and Customer Marketing and Service System ("CMSS") by April 4, 1996. The password/ID system will deny access by many sales and marketing employees to restricted customer records on an account basis, because their passwords will identify them as marketing enhanced services.

The account management and sales support databases described above support GTE's integrated residence and business customer services/sales representatives. Other systems that contain CPNI, also designed to support marketing and sales activities, are not utilized by these sales representatives. These systems are primarily used for market analysis and to support on time sales campaigns. Currently, there are no plans to implement an account based password protection system for these databases similar to the SORCES/SOLAR/CMSS systems. Instead, depending on the system, (1) enhanced services marketing and sales organizations are denied access to these systems or (2) restricted CPNI is entirely

removed from system data bases before enhanced services personnel are allowed access.

Numerous operations support systems (OSSs) and data bases that are not accessible to enhanced services marketing and sales personnel also contain CPNI. These systems are used for facilities assignment, provisioning, testing and maintenance, network engineering and planning, and accounting purposes. As a matter of normal security measures to protect company records from unauthorized access and tampering, it is standard operating practice that access to any particular system is limited to company personnel directly involved in those specific work processes that the system/database supports. Except as noted infra, marketing and sales personnel do not have access to the operations support systems used for these purposes. In addition, these systems are not designed for marketing and sales support, would be cumbersome to use, and contain only fragmented CPNI. Moreover, all of GTE's marketing and sales personnel will be trained on the Commission's CPNI rules and these system restrictions and have been advised that failure to comply will result in disciplinary action up to and including dismissal. GTE has no plans to implement an account-based password protection system for these OSSs.

Selected residence and business customer service/sales representatives have access to certain operations support systems, i.e., Billing Voucher and Treatment System ("BVT") and Customer Billing Administration System ("CBAS"), which are

infrequently used as auxiliary data bases for very specific purposes. These systems have other primary uses, and were specifically developed for those functions; however, in the interest of improving customer service, an access capability was provided to certain residence and business customer services/sales representatives. These service representatives use these systems to handle billing issues which would normally be directed to billing centers, verify customer address information, detect fraud, and assist in the preparation of certain complex service orders. These databases contain fragmented CPNI and have limited utility for account management and/or sales support.

In addition, as discussed previously, customer services representatives with enhanced services sales responsibilities will be specifically trained to access SORCES/SOLAR/CMSS first to determine if a customer has a restricted account. In this way, the customer service representative immediately knows by way of the password/ID system resident in SORCES/SOLAR/CMSS if a customer has a restricted account. A customer whose account has been restricted would be handed over to a "network only" customer service representative. These customer service representatives will be notified that circumvention of these protections will result in disciplinary action up to and including dismissal. For these reasons, there are no plans to implement an account-based password protection system for these databases.

## **2. Operations Support Systems (OSS)**

GTE currently provides the same "form of access" to its operations support systems (OSS) for its enhanced services group as it does for unaffiliated ESPs in compliance with the BOC OSS Order.

If GTE decides to provide direct access to OSS for its ESP, or if requests from unaffiliated ESPs meet the Commission's assessment criteria for ONA services, then GTE will develop, provision, and tariff such access in accordance with the CEI principles of its ONA Plan.

## **3. Network Information Disclosure**

The network disclosure obligations established by the Commission in its GTE ONA Order require GTE to disclose, at two different points in time, information about changes in its networks or new network services that affect the interconnection of enhanced services with the network.

First, at the "make/buy" point (the point at which GTE decides to make itself, or procure from an unaffiliated entity, any product which affects or relies on the network interface), GTE must notify the enhanced services industry of the new or changed network service, and must disclose technical information about the new or changed service to those members of the enhanced services industry that execute a nondisclosure agreement. GTE must provide this information within thirty days of the execution of the agreement.

Second, twelve months before a new or modified network service is introduced, GTE must publicly disclose technical information about the service. If GTE can introduce the service within twelve months of the make/buy point, it may make public disclosure at the make/buy point, but not less than six months before the introduction of the service.

GTE will comply fully with the Commission's network disclosure obligations. GTE employees will be advised of the Commission's requirements, and internal processes will be established to insure compliance. In addition, GTE will use company newsletters as vehicles for disclosure. The company newsletters will be issued as required by the notification time periods and will be targeted to known participants in the information industry that have expressed their interest via participation in industry forums, trade shows and seminars.

#### **4. Nondiscrimination in Installation and Maintenance**

GTE will continue to follow its existing procedures for the installation and maintenance of its BSAs, BSEs and CNSs to all prospective users in a nondiscriminatory fashion.

Available circuits and equipment are assigned on a "first-come, first-served" basis through highly mechanized procedures that neither depend on, nor are affected by, whether a particular customer is an affiliated or nonaffiliated ESP. The circuit assignment systems do not contain information regarding the identity of customers, and GTE will make no effort during the

actual facilities and equipment assignment process to determine whether a particular ordering customer is an ESP. The systems are blind to the use that a customer will make of particular facilities and equipment. Many enhanced services will rely on basic network services that are no different from those used by other customers. GTE's testing procedures are designed to assure that circuits meet tariffed standards. They are not set up to provide and generally do not contain any information related to the relative quality of available facilities and equipment.

GTE will comply with the nondiscrimination reporting requirements applicable to the BOCs. GTE will file an annual affidavit stating that it does not discriminate in providing ONA services to competitive ESPs and their customers, including the installation, maintenance, and quality of such services. GTE will file quarterly installation and maintenance reports using the reporting categories and format adopted for BOC reports as described in BOC ONA Reconsideration Order at Appendix B.

#### **C. NEW SERVICE REQUESTS**

GTE will provide a response to each ESP request for a new ONA capability within 120 days after receiving any complete, written request. GTE's response will indicate whether GTE will provide the capability, and if so, when it will make the requested capability available, the approximate charge for the capability based upon the demand estimates provided by the requesting ESP, and any technical problems that are anticipated.

GTE will develop standardized procedures and forms to enable GTE to respond to ESP requests for ONA capabilities in accordance with the above commitment and the Commission's requirements. Internally generated requests from GTE's enhanced services personnel for ONA capabilities will be subjected to the same procedures and evaluation process as requests received from nonaffiliated ESPs.

ESPs will be able to initiate the review process by contacting their marketing representative or the GTE Information Industry Team to inform GTE that they wish to formally request a new ONA capability. The marketing representative or the GTE Information Industry Team may forward the ESP's name and phone number directly to an ESP Specialist.

Normally within about two days, a GTE representative will contact the ESP and discuss the request, advise which area of the ESP Request Form should be completed for the particular request, and mail the Request Form to the ESP. After the ESP fills out the form, the ESP will mail it to the GTE Information Industry Team. The GTE Information Industry Team will screen the requests for completeness and clarity, assign each request an ESP request number, catalog the request, and remove the ESP's name and other identifying information from all those materials to be subjected to the evaluation process. If the written request form is not complete, GTE's Information Industry Team will contact the ESP to discuss what additional information is missing. The form will then be returned to the ESP for completion.



Upon receipt of a completed request for a new ONA service, the standardized form and related information will be assessed by the GTE Information Industry Team. This group will coordinate GTE's evaluation of the requested capability and the collection of information necessary to provide the ESP with a written response in accordance with the above commitment and the Commission's requirements. Any proprietary information will be treated in accordance with the terms of the standard nondisclosure agreement.

Simultaneously with the beginning of the assessment of the completed request, the GTE Information Industry Team will mail a written confirmation of acceptance to the requesting ESP. The date on which a completed request has been received, as reflected in this written confirmation, will constitute day 1 of the request for purposes of calculating the 120 day response period. The GTE Information Industry Team will serve as the ESP's point of contact for following the status of the request.

The specific criteria that GTE will apply in determining whether an ESP request for a new ONA service is complete are reflected in its standardized Request Form. The information set forth therein is required to evaluate a request based on the four BSE selection criteria established by the Commission.

Some of the information requested in the standardized Request Form may not be relevant for a particular request and may not need to be provided. As explained above, GTE will assist ESPs in ascertaining what information may not be relevant to a